

EXHIBIT E

Bonner, Kelly

From: Cheryll Calderon <ccalderon@mazieslater.com>
Sent: Tuesday, February 2, 2021 12:36 PM
To: Bonner, Kelly
Cc: Hansen, Forrest; Hill, Coleen W.; Priselac, Jessica
Subject: RE: Valsartan - Confidentiality Meet and Confer

Hi Kelly,

I spoke with Adam and he doesn't want to push the deadlines back any further. At this point, you should just file your motion to seal for the documents that were challenged prior to yesterday's filing and we can set a meet & confer schedule for next batch of documents.

Thanks,
Cheryll

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From: Bonner, Kelly
Sent: Tuesday, February 2, 2021 11:18 AM
To: Cheryll Calderon
Cc: Hansen, Forrest ; Hill, Coleen W. ; Priselac, Jessica
Subject: RE: Valsartan - Confidentiality Meet and Confer

Hi Cheryll,

Thanks for taking the time to speak with me this morning. Just following up on our conversation, you'll talk to Adam/Chris about an extension so that if necessary, we'll only have to file one omnibus sealing motion and avoid duplicative motion practice. Happy to discuss proposed dates with you.

Let's try to touch base on a game plan at the end of the day/sometime before 9pm tonight.

Also, are you good with a meet and confer tomorrow re: the proposed categories? If so, let us know a time that works for you.

Thanks,
Kelly

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From: Bonner, Kelly
Sent: Monday, February 1, 2021 8:03 PM
To: 'ccalderon@mazieslater.com' <ccalderon@mazieslater.com>
Cc: Hansen, Forrest <FRHansen@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>
Subject: RE: Valsartan - Confidentiality Meet and Confer
Importance: High

Hi Cheryll,

We submitted our proposed categories to our client for review last week, but we haven't heard back yet signing off. Can we propose to meet and confer on Wednesday to discuss? We'll follow up with our client before then.

Additionally, in light of Plaintiffs' email today proposing to challenge the confidentiality designations and file an additional 43 confidential documents as exhibits to their opposition to ZHP's motion for a protective order, we will need to extend the deadline to move to seal past February 5 if we want to handle these all in one motion—which would make the most sense given the overlapping documents at issue and to avoid duplicative motions, as well as L.Civ.R. 5.3.

Are you available for a call tomorrow morning to discuss an extension past 2/5 for handling this in one motion? My cell phone number is (973) 713-2029.

Thanks,
Kelly

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From: Hill, Coleen W.

Sent: Monday, January 25, 2021 7:02 PM

To: 'Cheryll Calderon' <ccalderon@mazieslater.com>

Cc: Hansen, Forrest <FRHansen@duanemorris.com>

Subject: Valsartan - Confidentiality Meet and Confer

Hi Cheryll,

Thank you for speaking to us today. Confirming our discussion, we plan to meet and confer with you this Wednesday regarding your proposed specific categories that may remain confidential, and then we intend to provide you proposed categories for confidentiality by this Friday or Monday. In the meantime, we will also analyze the public health exception factors in the *Avandia* matter that we discussed today. The ZHP Parties' deadline to file a motion to seal and/or send any letters to the Court has been extended to Friday, February 5.

Kind regards,
Coleen

	
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** Not yet admitted to practice in Pennsylvania. Only admitted to practice in Delaware.*

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